

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

ALI BAHAR	:	Case No. C-1-01-798
	:	J. Dlott
Plaintiff,	:	
	:	
vs.	:	
	:	
CITY OF CINCINNATI	:	<u>PLAINTIFF'S WITNESS LIST</u>
	:	
Defendant.	:	

In accordance with Federal Rule of Civil Procedure 26 (a)(3), Plaintiff states he intends to call the following witnesses at the trial of this matter:

1. **Tony Huang.** Mr. Huang will testify to matters testified to during his deposition.
2. **Pat Karney.** Mr. Karney will testify to matters testified to during his deposition.
3. **Rao Donepudi .** Mr. Donepudi will testify to matters testified to during his deposition.
4. **Sam George.** Mr. George will testify to matters testified to during his deposition.
5. **Tom Quinn.** Mr. Quinn will testify to matters testified to during his deposition.
6. **Joe Niehaus.** Mr. Niehaus will testify to matters testified to during his deposition.
7. **Bob Campbell.** Mr. Campbell will testify to matters testified to during his deposition.
8. **Julia Johnson.** Ms. Johnson will testify to matters testified to during her deposition.
9. **Ali Bahar.** Plaintiff has information concerning all matters at issue in this litigation.

10. **Laura Bahar.** Mrs. Bahar, Plaintiff's wife, will testify regarding the damages and impact of the national origin harassment suffered by Plaintiff.

To the extent Defendant's former employees are not available for trial, Plaintiff reserves the right to introduce portions of their depositions at trial.

Plaintiff reserves the right to call rebuttal witnesses or any witnesses listed on Defendant's witness list.

Respectfully submitted,

/s/ Kelly Mulloy Myers

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CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2004, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system and copies will be mailed via U.S. mail, e-mail and/or facsimile to those parties who are not served via the Court's electronic filing system. Parties may access this filing through the Court's System.

/s/ Kelly Mulloy Myers